

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

<b>UNITED STATES OF AMERICA,</b>	)	<b>Case No. 4:20CR03099</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>-vs-</b>	)	<b>MOTION TO COMPEL</b>
	)	<b>IDENTITY OF VICTIM AND</b>
<b>IAN WAGNER,</b>	)	<b>EX-BOYFRIEND</b>
	)	
<b>Defendant.</b>	)	

COMES NOW, Defendant, Ian Wagner, by and through his attorney, Justin Kalemkiarian, and moves this Court for an Order requiring the Government to provide the identities of the alleged victim and the alleged victim's ex-boyfriend, a witness in this case, to Defendant to prepare his defense.

WHEREFORE, Defendant prays for an Order of this Court permitting the disclosure, no later than three weeks before trial, of the identities of the alleged victim and alleged victim's ex-boyfriend.

DATED: May 21, 2021.

Respectfully submitted,  
Ian Wagner, Defendant

/s/ Justin Kalemkiarian  
Justin Kalemkiarian, #25415  
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